

**MURRAY-NOLAN BERUTTI LLC**  
**Attorneys at Law**

**Partners**

Gwyneth K. Murray-Nolan (NJ, NY, DC)  
[gwyneth@murray-nolanberutti.com](mailto:gwyneth@murray-nolanberutti.com)

**Associate**

Stephanie Jablonsky (NJ)  
[stephanie@murray-nolanberutti.com](mailto:stephanie@murray-nolanberutti.com)

Ronald A. Berutti (NJ, NY, KY)  
[ron@murray-nolanberutti.com](mailto:ron@murray-nolanberutti.com)

September 9, 2022

**Via ECF**

Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Shaw-Nae Dixon, et al. v. Bill DeBlasio, et al.**  
**Civil Action No. 1:21-cv-05090-BMC**  
**Our File No. 01016**

Dear Judge Cogan:

This firm represents the plaintiffs herein. Please accept this letter motion seeking leave to file a reply brief of 15 pages. Given the numerous issues involved and their importance, it is respectfully requested that the excess pages be permitted so that a fulsome reply may be given to the arguments set forth in defendants' response. We have reached out to our adversary, Kerri A. Devine, Esq., to seek consent for this request. Unfortunately, we have not yet received a response, although we do not anticipate an objection. Thus, we respectfully request that this motion be granted without consent.

We thank Your Honor for consideration of the above and apologize for any inconvenience.

Respectfully submitted,

**MURRAY-NOLAN BERUTTI LLC**

*Ronald A. Berutti*

By: \_\_\_\_\_  
Ronald A. Berutti

RAB:jm

cc: Kerri Devine, Esq. (via ECF)

**100 E. Hanover Avenue, Suite 401, Cedar Knolls, New Jersey 07927 (908) 588-2111**

**8707 Colonial Road, Brooklyn, New York 11208 (212) 575-8500 (Please reply to NJ office)**